

## **REMARKS**

The drawings are objected to under 37 CFR 1.83(a) for not showing the steps of recording, reading, measuring, and selecting as set forth in claim 16. In addition, Figure 7 is objected to under 37 CFR 1.83(a) for lacking appropriate labels. The specification is objected to for informalities. Claims 1-10 and 20-21 are objected to for informalities. Claims 10 and 16 stand rejected under 35 U.S.C. § 112, second paragraph as being indefinite. Claims 1-9, 11-15, and 17-22 are rejected under 35 U.S.C. §102(b) as being anticipated by United States Patent Number 5,629,813 to Baca et al (hereinafter "Baca").

For the Examiner's convenience and reference, Applicant's remarks are presented in substantially the same order in which the corresponding issues were raised in the Office Action. Please note that the following remarks are not intended to be an exhaustive enumeration of the distinctions between any cited references and the claimed invention. Rather, the distinctions identified and discussed below are presented solely by way of example to illustrate some of the differences between the claimed invention and the cited references.

Claims 1-11 and 20-22 are amended to more particularly point out and distinctly claim the subject matter of the claimed invention. The amendments are fully supported by the specification.

Response to objections to drawings under 37 CFR 1.83(a)

The drawings are objected to under 37 CFR 1.83(a) for not showing the steps of recording, reading, measuring, and selecting as set forth in claim 16. Applicant has canceled claim 16.

Figure 7 is also objected to under 37 CFR 1.83(a) for lacking appropriate labels. Accordingly, the modes 64, 66, 68, 70 of the original Figure 7 have been organized as Figures 7A-7D respectively. The paragraphs beginning on lines 13 and 18 of page 16 and the “Brief Description of the Drawings” are also amended to reference Figures 7A-7D.

Response to objections to the specification.

The specification is objected to for informalities. The paragraph beginning on line 8 of page 5 is amended as requested by the Examiner to cure the indicated informality.

Response to objections to the claims for informalities.

Claims 1-10 and 20-21 are objected to for informalities. Applicant has amended claim 3 to read “...trailing module is rigidly attached to the leading module...” and cure the informality. Applicant has also replaced “I/O” with “read” in claim 7 to cure the informality and conform to the language of claim 6.

Claims 1-10, 20, and 21 are amended to replace “recording head” with “recording/reproducing” head. Applicant chose “recording/reproducing” head to clarify that the head could read data while maintaining the term “recording” as supported by the specification.

Please notify the Applicant if the Examiner believes another term is more suitable.

Response to rejections of claims under 35 U.S.C. § 112 second paragraph.

Claims 10 and 16 stand rejected under 35 U.S.C. § 112, second paragraph, as being indefinite. Claim 10 is amended to cure the informality. Claim 16 is canceled.

Response to rejections of claims under 35 U.S.C. § 102.

Claims 1-9, 11-15, and 17-22 are rejected under 35 U.S.C. §102(b) as being anticipated by Baca. Applicant respectfully traverses this rejection.

Applicants have amended claims 1, 11, 20, 21, and 22 with the limitations "...selected leading read elements are substantially aligned with and read first selected tracks from the plurality of tracks, and selected trailing read elements are concurrently substantially aligned with and read second selected tracks from the plurality of tracks that are distinct from the first selected tracks." Claim 1 as amended, additions underlined. See also claims 11, 20, 21, and 22. The amendment is well supported by the specification, which teaches selecting combinations of leading and trailing read modules to read tracks. Page 17, Lines 19-24. Figures 7A-D further show combinations of leading and trailing read modules that may be selected to read tapes of varying widths. Page 16, Lines 13 – 24; Fig. 7A, Ref. 64, Fig. 7B, Ref. 66, Fig. 7C, Ref. 68, Fig. 7D, Ref. 70.

As amended, the present invention claims leading read elements that align with and read first selected tracks while trailing element concurrently align with and read second selected tracks

that are distinct from the first selected tracks. In contrast, Baca teaches leading read elements aligning and reading tracks, and trailing read elements aligning with and reading tracks. Baca, Col. 5, Lines 50-64; Col. 6, Line 48 – Col. 7, Line 49. However, Baca does not teach leading read elements aligning with and reading first selected tracks while trailing element concurrently align with and read second selected tracks that are distinct from the first selected tracks.

Baca specifically teaches using only either leading or trailing modules for reads and writes. Baca, Col. 5, Lines 50-64. Figure 3 of Baca shows 16 of the read/write element pairs are used in one direction and 16 are used in the other direction. Baca, Fig. 3, Ref. 20.

Baca also teaches calibrating the tape drive by measuring position error signals (PES) for various configurations of the servo read heads. Baca, Col. 6, Line 48 – Col. 7, Line 49. However, Table 1 on Col. 7 shows that either the Left or Right transducer modules are used. Baca, Table 1. Read elements for the Left and Right transducer elements are not concurrently used. The Examiner identifies the Left and Right transducer modules as analogs of the leading and trailing modules. Office Action of June 19, Page 5, Lines 2-5. The present invention as amended is differentiated in claiming that some first tracks are read with leading modules and other second tracks are read with trailing modules, while in Baca all tracks are either read with leading or with trailing modules. Applicant therefore asserts that because Baca does not teach all of the elements of the claims 1, 11, 20, 21, and 22, claims 1, 11, 20, 21, and 22 are allowable.

As a result of the presented remarks, Applicants assert that independent claims 1, 11, 20, 21, and 22 are in condition for prompt allowance. Claim 16 is canceled. Applicants have not specifically traversed the rejections of dependent claims 2-10, 12-15, and 17-19 under 35 U.S.C. § 102(b), but believe those claims to be allowable for depending from allowable claims. See, *In re Fine*, 837 F.2d 1071, 5 USPQ2d 1596 (Fed. Cir. 1988).

Should additional information be required regarding the traversal of the rejections of the dependent claims enumerated above, Examiner is respectfully asked to notify Applicants of such need. If any impediments to the prompt allowance of the claims can be resolved by a telephone conversation, the Examiner is respectfully requested to contact the undersigned.

Respectfully submitted,

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